BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Package Service (FCPS)   Docket No. N2021-2
Service Standard Changes, 2021

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS MICHELLE KIM
(PR/USPS-T-2)

(July 16, 2021)

Pursuant to 39 C.F.R. §§ 3020.117 and 3020.118, the Public Representative hereby submits the following interrogatories and requests for production of documents. Please refer to the testimony of Witness Michelle Kim.[1]

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or questions of clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,
/s/ Mallory L. Smith
Public Representative for
Docket No. N2021-2

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[1] *See* Direct Testimony of Michelle Kim on Behalf of the United States Postal Service (USPS-T-2), June 17, 2021.

1.   Please refer to USPS-T-2, at 8, lines 5-10. Witness Kim states that "[b]ased on preliminary estimates, [W]itness Hagenstein projects a 14 to 28 percent reduction in capacity on the Inter-[Network Distribution Center (NDC)] network and a 6 to 8 percent reduction in capacity on the Intra-NDC network. If these preliminary estimates prove valid once more robust modeling efforts are completed, this optimization of the NDC network could result in an additional $62 to $116 million in savings."

        a.   Please provide a disaggregated yearly cost savings of $62 to $116 million based on time line provided by Witness Hagenstein on the transition of the NDCs to Regional Distribution Centers.[2]

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[2] *See* Public Representative's Second Set of Interrogatories and Request for Production to United States Postal Service Witness Stephen B. Hagenstein (PR/USPS-T-1), July 16, 2021, question 1.